

FRANCIS J. GIAMBALVO
FGIAMBALVO@GRSM.COM

GORDON & REES
SCULLY MANSUKHANI
YOUR 50 STATE PARTNER™

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA, 28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GRSM.COM

June 10, 2019

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jing Zhang, et al. v. Jenzabar, Inc., et al., 12 Civ. 2988 (RRM) (RER)

Dear Judge Reyes:

This firm represents defendants, Jenzabar, Inc., The Jenzabar Foundation, Inc., All Girls Allowed, Inc. (“AGA”), and Ling Chai (“Chai”) (collectively, “Defendants”) in connection with the above-referenced matter. The parties jointly submit this correspondence pursuant to Your Honor’s May 30, 2019 order, as modified on June 7, 2019, in response to a proposed consent to Your Honor’s jurisdiction for purposes of trial.

The parties are unable to reach an agreement with respect to consenting to Your Honor’s jurisdiction for trial. Therefore, the parties do not consent to Your Honor’s jurisdiction for purposes of trial.

The parties jointly thank you for your consideration of this correspondence.

Respectfully submitted,

FRANCIS J. GIAMBALVO

Francis J. Giambalvo

cc: All Counsel of Record (*via ECF*)